

PHILLIP A. TALBERT  
United States Attorney  
EMILY G. SAUVAGEAU  
Assistant United States Attorney  
501 I Street, Suite 10-100  
Sacramento, CA 95814  
Telephone: (916) 554-2700  
Facsimile: (916) 554-2900

Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
GILBERT RAMIREZ and  
MICHAEL VALENTINO LOVATO,  
  
Defendants.

CASE NO. 2:23-CR-00016-TLN

STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
FINDINGS AND ORDER

DATE: August 31, 2023  
TIME: 9:30 a.m.  
COURT: Hon. Troy L. Nunley

**STIPULATION**

1. By previous order, this matter was set for status on August 31, 2023.
2. By this stipulation, defendants now move to continue the status conference until October 12, 2023, at 9:30 a.m., and to exclude time between August 31, 2023, and October 12, 2023, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
  - a) The government has represented that the discovery associated with this case includes over 450 pages, including law enforcement reports, criminal history reports, and recorded phone calls and text messages; which has been either produced directly to counsel and/or made available for inspection and copying.
  - b) Counsel for defendants desire additional time to consult with their clients, review

1 the discovery and the charges, prepare for trial, and investigate potential defense or mitigating  
2 factors.

3 c) Counsel for defendants believe that failure to grant the above-requested  
4 continuance would deny them the reasonable time necessary for effective preparation, taking into  
5 account the exercise of due diligence.

6 d) The government does not object to the continuance.

7 e) Based on the above-stated findings, the ends of justice served by continuing the  
8 case as requested outweigh the interest of the public and the defendant in a trial within the  
9 original date prescribed by the Speedy Trial Act.

10 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
11 et seq., within which trial must commence, the time period of August 31, 2023 to October 12,  
12 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code  
13 T4] because it results from a continuance granted by the Court at defendant's request on the basis  
14 of the Court's finding that the ends of justice served by taking such action outweigh the best  
15 interest of the public and the defendant in a speedy trial.

16 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the  
17 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial  
18 must commence.

19 IT IS SO STIPULATED.

20  
21 Dated: August 22, 2023

PHILLIP A. TALBERT  
United States Attorney

22  
23 /s/ EMILY G. SAUVAGEAU  
EMILY G. SAUVAGEAU  
Assistant United States Attorney

24  
25 Dated: August 22, 2023

26 /s/ Michael Hansen  
Michael Hansen  
Counsel for Defendant  
27 GILBERT RAMIREZ  
28

Dated: August 22, 2023

/s/ Chris Cosca

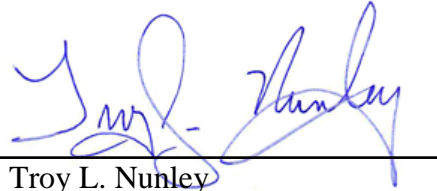
Chris Cosca

Counsel for Defendant

MICHAEL VALENTINO LOVATO

**ORDER**

IT IS SO FOUND AND ORDERED this 22<sup>nd</sup> day of August, 2023.



Troy L. Nunley

United States District Judge